

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

SCANSOFT, INC.'S ASSENTED-TO MOTION FOR IMPOUNDMENT

ScanSoft, Inc. (“ScanSoft”) moves, pursuant to Local Rule 7.2 and paragraph 14 of the parties’ Protective Order for an order granting leave to file under seal Plaintiff’s Response to Defendants’ Objections to the Magistrate Judge’s Order Requiring Trade Secrets Discovery, filed concurrently by hand.

As grounds for this motion, ScanSoft states that the Response discloses portions of the transcript of the February 22, 2005 deposition of Daniel Roth, designated by VST as “Highly Confidential.” The Response also discloses highly sensitive and proprietary ScanSoft trade secret information contained in ScanSoft’s Answers to the Second Set of Interrogatories (Nos. 1-4) of VST, designated by ScanSoft as “Highly Confidential.”

Accordingly, pursuant to the terms of the Protective Order, ScanSoft moves that the Response be placed under seal in the envelope provided and that impoundment continue pursuant to Local Rule 7.2 and the terms of the Protective Order. Alternatively, should the Court

deny this motion to file under seal, ScanSoft respectfully requests that the Response be treated as filed in the regular course and placed in the public record.

Dated: April 27, 2005

SCANSOFT, INC.,
By its attorneys,

/s/ Rebecca L. Hanovice

Lee Carl Bromberg, BBO #058480
Robert Asher, BBO #022865
Erik P. Belt, BBO # 558620
Lisa M. Fleming, BBO #546148
Jack C. Schechter, BBO #652349
Rebecca L. Hanovice, BBO # 660366
BROMBERG & SUNSTEIN LLP
125 Summer Street
Boston, Massachusetts 02110-1618
(617) 443-9292
ghanovice@bromsun.com

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for ScanSoft conferred with counsel for VST on April 27, 2005 in an effort to resolve the issues presented in this motion and that counsel for VST assented to this motion.

/s/ Rebecca L. Hanovice

02639/00509 381928.1